

August 12, 2008

BAF-RX-08-016

Mr. Zach Klotovich
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

Re: Request for Administrative Permit Amendments to Basic American Foods Air Permits for
Rexburg: Tier I Permit No. T1-2008.0053 and Tier II Permit No. T2-030515.

Dear Mr. Klotovich;

Basic American Foods (BAF) recently attended a permit hand off meeting with the Regional Department of Environmental Quality (DEQ) staff for the above referenced permits for our Rexburg facility. We appreciate DEQ's efforts in working through the previous requests for administrative changes requested by BAF. As we have previously discussed on the phone and at the hand off meeting; these changes are administrative in nature and requested to more clearly define the conditions that are listed in the permit. BAF comments are listed below in the order in which they apply in the permit:

- 1. Tier I Operating Permit Scope:

- Subsection 1.2

- The permit to construct letter issued on July 30, 1980 should not be incorporated into this permit for it is excluded from the Tier II permit.

- 5. Process A:

- Subsection 5.7 and 5.8

- It is unclear which date should be used as the permit issuance date. Please modify the language to state the following: "Within 180 days of June 10, 2008, the permittee shall ...".

- 6. Process B:

- Subsection 6.7

- It is unclear which date should be used as the permit issuance date. Please modify the language to state the following: "Within 180 days of June 10, 2008, the permittee shall ...".

- 8. Carbon Monoxide Emissions Limit:

Subsection 8.2

In reviewing the language in the first sentence of this section it appears the word "production" was omitted after the word steam. The portion of the sentence should read: "... Based on steam production and coal consumption ...".

Subsection 8.4.1

BAF requested that this section be based on a standard calendar year such that the report will comprise the period from January 1st through December ³¹. The report would be due on or before March 1st of each calendar year.

- 11. Tier I operating Permit General Provisions:

Item 21.a


BAF requests the same reporting schedule as detailed in subsection 8.4.1 above.

Item 24

BAF requests the same reporting schedule as detailed in subsection 8.4.1 above with the understanding that this report will be due semiannually and within 30 days of the requested reporting period.

BAF again appreciates DEQ's willing to allow the submission of additional amendments requests and acknowledges the efforts that have been made to update and bring current the Rexburg Tier I and II operating permits. BAF feels that this request is consistent with the intent of the IDAPA rules regarding administrative amendments. Please feel free to contact me or my staff if you have any needs for any further documentation or clarification.

Sincerely,



John S. Kirkpatrick, P.E.

Environmental manager - Idaho Operations

CC: Nelson Rovig, Director of Idaho Operations

Joe Milligan, Rexburg Facility Manager